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December 8, 2005

VIA FACSIMILE & FIRST CLASS MAIL

Anthony Angelone, Esquire Vendetti & Vendetti 3820 Liberty Street Erie, PA 16509

Timothy D. McNair, Esquire Law Office of Timothy D. McNair 821 State Street Erie, PA 16501

RE: Abby Conley v. County of Erie, et al.

U.S. District Court for W. District - No. 05-CV-76 E

Dear Counselors:

I am in receipt of Mr. McNair's letter concerning the responses to plaintiff's discovery. In order to give it the attention that it deserves, based up on its length, I need to review its contents thoroughly in order to prepare my response. I will do so and respond as soon as I am able to.

However, I urge the two of you to meet and to review all documents that were produced during the prior administrative litigation. It is my understanding that many of the documents, if not all of them, that have been used during the depositions, had been previously produced in that litigation to Mr. Angelone.

Very truly your

Edmond R. Joyal, Jr.

ERJ



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